

JONATHAN D. MCDOUGALL
CA STATE BAR NO. 212359
1640 Laurel Street
San Carlos, CA 94070
Telephone: (650) 594-4200
Facsimile: (650) 594-4205

Attorney for Defendant
PETER LASELL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE UNITED STATES OF AMERICA,)	CR-07-00716
)	
)	STIPULATION AND
Plaintiff,)	PROPOSED ORDER
)	REGARDING STAY OF
vs.)	SURRENDER DATE
)	
PETER LASELL)	
Defendant.)	

With the agreement of counsel for both parties and with the consent of defendant Peter Lasell, the Court enters this order documenting an amendment to the AMENDED JUDGEMENT IN A CRIMINAL CASE dated August 19, 2008. The parties agree, and the Court finds and holds as follows:

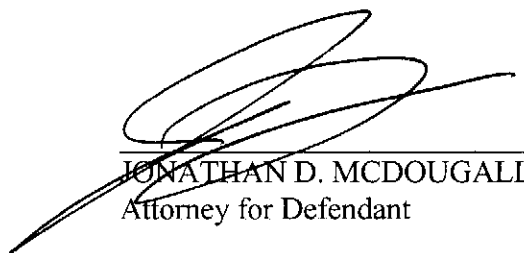
1. Defendant made his initial appearance before the Magistrate Zimmerman on November 19, 2007, at which time the Court issued Conditions of Release and Appearance, specifically allowing defendant's release on unsecured \$250,000.00 bond and home electronic monitoring.
2. On August 19, 2008, the Honorable United States District Judge Marilyn Hall Patel rendered an amended sentencing order, committing the Mr. Peter Lasell to the United

States Bureau of Prisons for a term of (48) months. Mr. Lasell is to surrender on January 5, 2009 before 2:00 p.m.

3. On December 26, 2008, Dr. Kenneth Do Lee, M.D., diagnosed Mr. Peter Lasell with a pleural effusion, and performed a fluid draw of in excess of one pint of fluid from an area lining his right lung. Dr. Lee requests an additional time to diagnose and treat this condition.
4. On January 5, 2009, the Honorable United States District Judge Marilyn Hall Patel signed an Order modifying her August 19, 2008 sentence to allow Mr. Lasell to surrender on January 12, 2009 at FCI Forth Worth, Texas based upon Mr. Lasell medical condition, following a stipulation between the parties.
5. Defense counsel secured a stipulation to a one week stay of Mr. Lasell's surrender date until Monday, January 12, 2009 in order to allow further discussions with AUSA Allison Danner to secure a more lengthy stay of Mr. Lasell's surrender based upon a medical emergency.
6. Defense counsel is now seeking a (30) day stay until February 12, 2009 at 2:00 p.m. to allow for diagnosis of Mr. Lasell pleural effusion.
7. Defense counsel has provided a letter from Dr. Kenneth Lee M.D., San Bruno Medical Center, dated January 7, 2008, asking for one month to diagnose and resolve the potentially terminal problem.
8. Assistant U.S. Attorney Allison Danner does not object to this modification and (30) day stay of surrender.
9. Accordingly, and with the consent of all parties, the defendant seeks the following AMENDMENT and provides a proposed ORDER.

1 IT IS SO STIPULATED.

2
3 DATED: January 9, 2009



JONATHAN D. MCDOUGALL
Attorney for Defendant

5 DATED: January 9, 2009

_____/s/
ALLISON M. DANNER
Assistant U.S. Attorney

7 IT IS SO ORDERED THAT DEFENDANT PETER LASELL SHALL SURRENDER
8 BEFORE 2:00 P.M. ON 2/12/09.

9 DATED: January 13, 2009

10 HONORABLE MARILYN H. PATEL

